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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CLERK
U.S. DISTRICT COURT
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MCI WORLDCOM NETWORK SERVICES, INC.,)	
Plaintiff,)	
v.)	No. 02 C 4394
ATLAS EXCAVATING, INC.,)	Judge Moran
Defendant.)	Magistrate Judge
)	Geraldine Soat Brown

TO: John P. Morrison/Robert R. Brown, Bell Boyd & Lloyd, LLC
Three First National Plaza, 70 W. Madison St., Suite 3300, Chicago, IL 60602

James J. Proszek/Kimberly R. Beidler, Hall Estill Hardwick Gable Golden & Nelson P.C.
320 South Boston Ave., Suite 400, Tulsa, OK 74103-3708

NOTICE OF MOTION

On August 20, 2002, at 9:00 a. m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Moran or any judge in his stead, in the courtroom usually occupied by him in Room 1843, U.S. District Court, Northern District of Illinois, Eastern Division, 219 South Dearborn Street, Chicago, Illinois, and shall then and there present the attached Motion for Leave to Appear & Extend Time.

Name:	Jump & Associates, P.C.	Attorney for Defendant
Address:	Eleven South LaSalle Street	City: Chicago
Telephone:	(312) 629-5757	

DOCKETED

PROOF OF SERVICE

AUG 20 2002

Under penalties as provided by law pursuant to 735 ILCS 5/1-109, I certify that on the 12th day of August, 2002, the document referred to in this Notice was served upon each person to whom this Notice is addressed:

- By personal delivery;
- Via facsimile;
- By placing a copy of same in an envelope properly addressed and stamped in a U.S. mail box at 11 South LaSalle Street, Chicago, Illinois.

Virginia O'Neil

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Plaintiff,
v.
No. 02 C 4394
ATLAS EXCAVATING, INC.,)
Judge Moran
Magistrate Judge
Geraldine Soat Brown
Defendant.

MOTION FOR LEAVE TO APPEAR & EXTEND TIME

NOW COMES DEFENDNT, ATLAS EXCAVATING, INC., by its attorneys, Jump & Associates, P.C., and moves the Court to enter an order granting it leave to file its Appearance *instanter*, and further granting it an extension of time of fourteen (14) days, up to and including August 26, 2002, within which to answer or otherwise plead to Plaintiff's Complaint.

WHEREFORE, DEFENDANT, ATLAS EXCAVATING, INC., respectfully requests the Court to enter an order granting said Defendant leave to file its Appearance *instanter*, and further granting an extension of time of fourteen (14) days, up to and including August 26, 2002, within which to answer or otherwise plead to Plaintiff's Complaint.

Respectfully submitted:

JUMP & ASSOCIATES, P.C.

By:

R. Howard Jump

JUMP & ASSOCIATES, P.C.
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